

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION AT GREENEVILLE**

In re	:	
	:	
JACK ROBERT THACKER, JR.	:	Case No. 2:25-bk-50237-RRM
a/k/a JACK R. THACKER,	:	Chapter 11 – Subchapter V
a/k/a J. R. THACKER	:	
	:	
Debtor	:	

MOTION FOR ENTRY OF AMENDED AGREED ORDER

On March 27, 2025, the Court entered the Agreed Order Granting Motion To Sell 4332 Pretoria Run Free And Clear Of Liens And Interests (Doc 51). The Agreed Order does not provide for a waiver of the 14-day stay. The attorney for the United States Trustee, the Subchapter V Trustee, and the attorney for the parties who filed the Objection to the Sale (Doc 44) have agreed the Agreed Order may be amended to include a waiver pursuant to Federal Rule of Bankruptcy Procedure 6004(h). Accordingly, the Debtor requests entry of the proposed Amended Agreed Order Granting Motion To Sell 4332 Pretoria Run Free And Clear Of Liens And Interests submitted with this Motion.

/s/Maurice K. Guinn
Maurice K. Guinn (Bar Code No. 000366)
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 27, 2025, the foregoing **“Motion for Entry of Amended Agreed Order”** and the proposed **“Amended Agreed Order Granting Motion To Sell 4332 Pretoria Run Free And Clear Of Liens And Interests”** were filed electronically. Notice of this filing will be sent by operation of the Court’s electronic filing system to the Tiffany DiIorio, Andrew Wesley Hogan, Eric W. Reeher, M. Aaron Spencer, Anthony R. Steele, Walter N. Winchester, and the United States Trustee.

/s/ Maurice K. Guinn
Maurice K. Guinn

Mot for Entry of Amended Agreed Order (3-27-25)